

EXHIBIT 297

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

Plaintiff,

vs.

No. 22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF CECILE DE JONGH was
taken on the 29th day of May, 2021 at the Ritz-Carlton
Hotel, 6900 Great Bay, Nazareth, St. Thomas, U.S. Virgin
Islands, between the hours of 9:02 a.m. and 2:22 p.m.
pursuant to Notice and Federal Rules of Civil Procedure.

Reported by:

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Hill's Reporting Services
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1 had an issue, who should I talk to to get something
2 done.

3 Q. Okay. All right. And did your husband
4 have any process for recusing himself from issues that
5 related to the company you worked for?

6 A. I don't know if he had any process.

7 Q. Okay. You're not aware of any?

8 A. I said I don't know.

9 Q. Okay. You're not aware of him recusing
10 himself from any issue regarding Mr. Epstein?

11 A. I'm not aware of that, no.

12 Q. Okay. All right. Now, when your husband
13 became the governor, did you sort of get a second job
14 result of that as the first lady of the Virgin
15 Islands?

16 A. Yes.

17 Q. And what did that job entail?

18 A. Giving a lot of speeches. I mean, he ran
19 twice. So he ran in 2002 and lost. I was not very
20 involved in that campaign. And between 2002 and
21 2006, you know, right after 2002, we discovered that
22 our youngest son had some serious health issues.

23 So I was very focused on that. We both
24 were. And then he subsequently decided to run in
25 2006, and I was very involved in making sure that our

1 son was okay.

2 I also had my great aunt who was in
3 failing health. She had had breast cancer. And so
4 part of that -- I mean, he actually made me a promise
5 that I would never have to give a speech, and that
6 was not true.

7 And he asked me to head up -- well, he
8 and his team asked me to head up the Women For de
9 Jongh- Francis at the time, and -- which I did. And
10 so we did -- you know -- so during the campaign part,
11 we did things like, you know, gatherings for
12 children, walking -- you know, doing walks and just
13 sort of -- and food sales and things like that.

14 And I tried to do as many things as I
15 could that wouldn't take away time from either work
16 or from my children.

17 And then once he won, it became very
18 overwhelming because my aunt passed away within two
19 months of my husband becoming governor. I had to
20 settle her affairs, and my mother was diagnosed with
21 Alzheimer's, and my sister, who was bipolar --

22 Q. I'm sorry. I saw in the emails about your
23 sister -- you don't have to talk about that if you
24 prefer not to.

25 A. She had a very public breakdown which was

1 newsworthy at the time. So there was just a lot on
2 my plate.

3 And then I was also very involved in the
4 National Governors Association.

5 THE REPORTER: I'm sorry.

6 THE WITNESS: The National Governors
7 Association, because a lot of the first ladies
8 were involved in mostly of children's
9 activities.

10 And the thing that I chose to do was to --
11 to focus on literacy, because there are many
12 children in the Virgin Islands that didn't
13 have -- when we would do door-to-door, during
14 the campaign, one of the things I discovered
15 that a lot of the household didn't have books in
16 them.

17 So my big project every year was to find
18 a local author and have them write a book and give
19 the books away for free because I didn't want to give
20 toys and I didn't want to give candy.

21 And so we'd have holiday parties and
22 give away the books. So I would raise money during
23 the year for that. And which, you know, took up a
24 lot of time. But I also got a lot of requests for --
25 just give a lot of speeches.

1 Q. And did you have an office as first lady?

2 A. No.

3 Q. Did you have, like, an office address?

4 A. No.

5 Q. Do you have, like, an official Twitter
6 feed?

7 A. Somebody set up a, I think a FaceBook
8 something for me. I'm -- I'm not on -- I'm not on
9 Twitter. I actually don't know how Twitter works.

10 And I know that I had -- I had an email
11 that was set up for me that I never really used
12 because I had to go into the government system and
13 then do something else and something else to get into
14 it. And so I just asked the head of protocol, Raul
15 Carrillo, I said if anything comes in, because it was
16 -- it was the email address that they would give out
17 to people saying, you know, if you want the First
18 Lady to, you know, give a speech or show up
19 somewhere, you know, email her at this email address.

20 And so that was what was done. so I said
21 can you just monitor it and if -- you know, just send
22 me whatever and I'll see whether it fits into my
23 schedule and I would either do it or not do it.

24 Q. Okay. And did you have any staff that
25 helped you in your role as First Lady?

1 A. Well, I had the chief of protocol. But
2 everybody -- all those people worked for Government
3 House. So it was the expectation that if there was a
4 social event -- if there was a social event, I was
5 responsible for it. I found it sometimes very
6 misogynistic.

7 Q. Sure.

8 A. But it was what it was. That if -- you
9 know, if there was going to be sort of an event after
10 the State of the Territory, that I should be pick the
11 caterer, I should do this, you know.

12 And so the chief of protocol had one or
13 two staff members, and so I would have -- you know, I
14 would run over to Government House and say, okay,
15 what are we doing? You know, who are we inviting?
16 And they would sort of handle everything.

17 But they worked for -- they didn't
18 exclusively work for me. They worked for Government
19 House.

20 Q. Got it. All right. Let's look at
21 Exhibit 3.

22 MS. WARREN: Tab 3, Exhibit 1.

23 MR. NEIMAN: Yeah, Tab 3. I will ask
24 the reporter to mark as Exhibit 1 a one-page
25 document.

1 with them to inspect it.

2 So, here's your R.O. plant, here's the
3 generator. So I did that, and I think they came over
4 like three different times for that.

5 Q. Okay.

6 A. One for the R.O. plant, and I think twice
7 for the generator because I think, if I remember
8 correctly, something, they needed something for the
9 spill kit, wasn't there. So he come back and make
10 sure whatever needed to be in the spill kit was
11 there.

12 Q. Okay. Is that all the meetings that you
13 remember -- withdrawn.

14 All the times that you remember going to
15 Little St. James?

16 A. Little St. James, yes.

17 Q. Okay. Did there come a time when you
18 learned that Mr. Epstein had been arrested in Florida?

19 A. Yes.

20 Q. When was that?

21 A. I think that was in 2006.

22 Q. Okay. How did you learn about it?

23 A. In the news.

24 THE REPORTER: I'm sorry.

25 THE WITNESS: In the news.

1 Q. (By Mr. Neiman:) What do you remember
2 learning about it?

3 A. That he was arrested for soliciting an
4 underage -- soliciting a minor.

5 Q. Okay. Did you ever talk to Mr. Epstein
6 about that?

7 A. I did.

8 Q. Tell me about that conversation.

9 A. I basically asked him what was going on
10 and like -- I don't want to swear, but --

11 Q. Go ahead.

12 A. Sort of, like, what the hell is going on.
13 And he said, I -- it was an error in judgment. And I
14 said, so, that's it, you approached somebody who you
15 thought was older? And he said, yes.

16 And -- but she wasn't? And he said, no.

17 And I said, "And so you -- that's what
18 you were arrested for? That was it?" And he said,
19 "Yes."

20 And I said -- so I said to him, I said,
21 so, this will never happen again? And he goes,
22 absolutely not. I've learned my lesson.

23 I said, well, yeah, I mean, you know,
24 seems like you're in big trouble. And he says, yes.
25 And then when I learned, you know, that, you know,

1 that he would be -- well, that's, you know -- that's
2 the conversation that we had at this point.

3 Q. All right. And what happened from there on
4 at this time?

5 MS. BOGGS: Objection. Vague.

6 Q. (By Mr. Neiman:) You could answer.

7 A. I'm sorry.

8 Q. Just let me explain how this works. The
9 lawyers sometimes have to say "objection," but unless
10 they tell you not to answer, you could go ahead and
11 answer.

12 A. Okay. And I do specifically remember when
13 I learned that he was going to be, because of that
14 one incident, that he said was one incident, that he
15 would have to be a registered sex offender.

16 I remember it because I went home to my
17 17-year-old son and I said, you know, this sex
18 offender thing is very serious and I want you to be
19 very careful, because he was about to go off to
20 college.

21 And I said and I -- don't make any
22 mistakes because this is the rest of your life you're
23 talking about. So don't date anybody younger, don't
24 go out to bars and, you know, just, you know, and,
25 you know, be on your P's and Q's.

1 And he was, like, mom, and I said, I
2 just -- I'm nervous about this, you know, because I
3 have two boys, and my other son was nine years
4 younger, so it wasn't a conversation I would have
5 with him at the time.

6 But I just said, you know, you're going
7 off to college and I just -- you know, we've had --
8 we've had the black talk, and I wanted to have this
9 talk with him. That this was very important that you
10 remember this because this is the rest of your life.

11 Q. Okay. Did you have further discussions
12 with Mr. Epstein about the events that led to his
13 arrest?

14 A. No, I didn't.

15 Q. Okay. Did you have further discussions
16 with Mr. Epstein about the case he was facing in
17 Florida and what was going to happen to him?

18 A. No, I did not.

19 Q. Okay. Other than that one conversation
20 that you've described where you asked him what the
21 hell is this about, and he gave you his story, did you
22 ever talk to him further about anything related to the
23 case against him in Florida?

24 A. I never had a conversation with him about
25 it, no.

1 Q. Okay. Did you continue to see things in
2 the newspaper about him?

3 A. I continued to see things in the newspaper
4 about, you know, that it was solicitation, and that
5 he was going to be a registered sex offender, which
6 lined up with what he said.

7 Q. I mean, did you see articles indicating
8 that the investigated related to dozens of people?

9 A. At that time, I don't recall seeing that
10 until much, much later.

11 Q. Okay. And how did you find out that he was
12 going to go to jail?

13 A. I don't recall how I found out. I
14 actually don't recall how I found out he was going to
15 jail.

16 Q. Okay. But at some point you did find out
17 that he was going to jail?

18 A. Yeah. Eh-hmm.

19 Q. Did you ever talk to him about that?

20 A. I think he talked to the whole office and
21 told the whole office --

22 THE REPORTER: I'm sorry.

23 THE WITNESS: He talked to the whole
24 office and told the office that he going to be
25 away.

1 Q. (By Mr. Neiman:) And what did he say?

2 A. Just, I'm gonna be away for a while for a
3 stupid thing that I did.

4 Q. And did it make sense to you his story,
5 that he was going to jail for one time, soliciting one
6 person who he didn't realize was underage?

7 MS. BOGGS: Objection, vague.

8 THE WITNESS: It did at the time, you
9 know. He was in Florida. You know, that was
10 Florida law, and that's, you know, his -- you
11 know, those were all the stories that came out
12 in the newspaper, that this is what was going
13 to happen. Nothing else came out that -- that
14 he was going away for anything else.

15 Q. (By Mr. Neiman:) Did you hear -- recall
16 hearing rumors at that time that he had been bringing
17 young women to Little St. John -- Little St. James,
18 rather?

19 A. No.

20 Q. When did you start hearing those rumors?

21 MR. TEAGUE: Object to form. You can
22 answer.

23 Q. (By Mr. Neiman:) You can answer.

24 MR. TEAGUE: You can answer.

25 THE WITNESS: Not until like early '19,

1 2019 when I think the Miami Herald started
2 running stores about him.

3 Q. (By Mr. Neiman:) And did you talk to
4 Mr. Epstein when you saw those stories?

5 A. No, I didn't. I emailed Darren and said,
6 basically, is there any truth to any of this?

7 Q. Eh-hmm.

8 A. And he responded, no.

9 Q. Had you ever seen young women around
10 Mr. Epstein?

11 A. No. -- I mean, he had Sarah Kellen, who
12 was his assistant.

13 Q. Eh-hmm.

14 A. She was in her twenties. And he had his
15 girlfriend, Karyna, who was in her twenties.

16 Q. Eh-hmm.

17 A. Those were the -- those were the young
18 women that I had seen.

19 Q. Okay. Do you remember a time when he asked
20 you to help him with some issues related to other
21 young women?

22 MS. BOGGS: Objection, vague.

23 Q. (By Mr. Neiman:) You can answer.

24 A. I think there was a time when he asked
25 about some young ladies going to UVI.

1 Q. Second page of the document in response to
2 your email.

3 A. Eh-hmm.

4 Q. Ms. Jackson writes back, right?

5 A. Yeah.

6 Q. And there's a little back and forth. And
7 then on the first page, at the bottom of the page
8 Ms. Jackson advises you that this ESL class isn't
9 offered every semester. Do you see that?

10 A. Yes.

11 Q. And that what they do is they keep a list
12 of names and when they get enough people, they offer
13 the class. Do you see that?

14 A. Yes.

15 Q. And you passed that information on to
16 Mr. Epstein, right?

17 A. Yes.

18 Q. And Mr. Epstein wrote back to you and said,
19 "If it worked, both Julia and Renata would sign up."
20 Do you see that?

21 A. Yes.

22 Q. So he's now telling you there are two women
23 who could benefit from an English as a second class --

24 A. Okay.

25 Q. -- that he might want to arrange, right?

1 (Deposition Exhibit No. 26 was
2 marked for identification.)

3 Q. (By Mr. Neiman:) Okay. Let's take a look
4 now at Exhibit 26. You see at the bottom of the page,
5 Mr. Epstein writes back to you, "I can enroll Julia,
6 Renata, and Svet if that helps the school." Do you
7 see that?

8 A. Eh-hmm.

9 Q. So he's now identified a third person with
10 an Eastern European name who could benefit from
11 English as a second language classes, right?

12 MR. TEAGUE: Objection, form. You could
13 answer.

14 THE WITNESS: Yes, those three names
15 were there.

16 Q. (By Mr. Neiman:) Okay. Did it ever cross
17 your mind to wonder whether there was something wrong
18 with this convicted sex offender telling you I have
19 three women who I'd like to help learn to speak
20 English?

21 MS. BOGGS: Objection, vague,
22 argumentative.

23 THE WITNESS: This is -- this is a
24 person who had one offense, had to register as
25 a sex offender. Didn't see him with any --

1 anybody underage, or anything. And I'm
2 thinking he is just trying to be helpful to
3 people.

4 Okay. Just like he is helpful for people
5 in our office when somebody dies and, you know,
6 he helps them fly their, you know, their --
7 their parents wherever they need to get buried.
8 Whatever is asked, he would usually do it.

9 I would hear, you know, when somebody is
10 on the island, you know, somebody was from Haiti
11 and they needed to take supplies down to their
12 family, he flew them down to do that.

13 In that context, that's what I was
14 thinking, that's what he does. So I had no
15 reason to believe that he was doing anything
16 untoward with these ladies.

17 Q. (By Mr. Neiman:) Eh-hmm. And the fact
18 that he was doing something on behalf of Eastern
19 European women didn't raise a red flag in your mind?

20 A. Well, how would I know based on the names
21 that they're necessarily Eastern European.

22 Q. Well, Renata?

23 A. Renata could be Italian.

24 Q. Svetlana?

25 A. Svetlana? You know, Julia?

1 Q. Well, Svetlana? Eastern European?

2 A. Just like --

3 MS. BOGGS: Objection, argumentative.

4 MR. TEAGUE: I mean, the spelling,
5 Counsel, is S-V-E-T. So you're telling me
6 that's Svetlana?

7 MR. NEIMAN: Well, I can show you 20
8 more documents here it's spelled Svetlana.

9 MR. TEAGUE: Then that's fine.

10 THE WITNESS: Okay. I would never do
11 anything to harm anyone, or to aid and abet
12 anyone in harming someone.

13 Q. (By Mr. Neiman:) Yeah. So just staying on
14 top, let's just take a look at --

15 A. No, no.

16 Q. -- at 181.

17 A. -- you're accusing me of something.

18 MR. TEAGUE: Wait for the question.

19 THE WITNESS: No, I have a daughter,
20 too.

21 MR. TEAGUE: That's okay. Wait for the
22 question to be asked.

23 THE WITNESS: I have a daughter. And I
24 wouldn't want anybody to do that to my
25 daughter. And by the way, just as a joke, I

1 actually enrolled my daughter in ESL for camp
2 not knowing what it was.

3 Q. (By Mr. Neiman:) Okay. Let's take a look
4 at --

5 MR. TEAGUE: Counsel, we are going to be
6 taking a break in about 15 minutes. So just
7 to give you a head's up.

8 Q. (By Mr. Neiman:) Sure. That's fine.

9 MR. NEIMAN: I ask the reporter to mark
10 Exhibit 27, a two-page document.

11 (Deposition Exhibit No. 27 was
12 marked for identification.)

13 Q. (By Mr. Neiman:) All right. You see that
14 Exhibit 27 is another email exchange on this topic of
15 the ESL course at the U.S. Virgin Islands -- excuse
16 me. Withdrawn. I'll start again.

17 Do you see that Exhibit 27 --

18 A. Yes.

19 Q. -- is another email exchange on this ESL
20 course at the University of the Virgin Islands topic?

21 A. Yes.

22 Q. Okay. And you'll see at the second page of
23 the email, that a person named Ann Rodriguez at the
24 bottom of the first page, top of the second page, is
25 chiming in with some information about the last names

1 an email in June of 2013 from you to Mr. Epstein,
2 correct?

3 A. Eh-hmm.

4 Q. And it's, again, on this topic of the ESL
5 class?

6 A. Right.

7 Q. And you're asking Mr. Epstein if the ladies
8 still plan on taking the class this summer?

9 A. Right.

10 Q. Okay. From your point of view, do you
11 think it's unfair to suggest that knowing that
12 Mr. Epstein was doing things for women with Eastern
13 European names is the same as a red flag for sex
14 trafficking?

15 MS. BOGGS: Objection, argumentative.

16 MR. TEAGUE: Objection.

17 Q. (By Mr. Neiman:) From your point of view.

18 MR. TEAGUE: Objection to form.

19 THE WITNESS: From hindsight, from where
20 I sit now?

21 Q. (By Mr. Neiman:) No. Well, from where you
22 sat then?

23 A. Where I sat then? I didn't know -- didn't
24 know anything about sex trafficking then. He had
25 one -- one charge for solicitation. Didn't know

1 anything about sex trafficking.

2 Q. (By Mr. Neiman:) Right. And so --

3 MS. BOGGS: Since we're talking about
4 victims of sex trafficking, let's designate
5 the entire transcript as confidential.

6 MR. NEIMAN: Sure.

7 MS. BOGGS: And then we can de-designate
8 as determined by the practice of the parties.

9 MR. NEIMAN: Of course.

10 THE REPORTER: Determining by --

11 MS. BOGGS: By the practice of the
12 parties.

13 Q. (By Mr. Neiman:) Okay. Let me just ask
14 you the question from your point of view knowing what
15 you knew at the time.

16 A. I'm sorry.

17 Q. From your point of view --

18 A. Eh-hmm.

19 Q. -- knowing what you knew at the time, do
20 you think it would be unfair to infer from evidence
21 that Mr. Epstein was doing something to benefit women
22 from Eastern Europe that he was engaged in sex
23 trafficking.

24 MS. BOGGS: Objection.

25 MR. TEAGUE: Objection, form.

1 So I thought he was an architect, and
2 then somebody said, no, I think he's a talent agent
3 or something.

4 Q. Okay. That was Mr. Brunel?

5 THE REPORTER: That was Mr. --

6 MR. NEIMAN: Mr. Brunel.

7 THE WITNESS: I subsequently, like -- I
8 think when he -- when I read that he committed
9 suicide, that I figured out that that's who
10 that was.

11 Q. (By Mr. Neiman:) I got it. Anything else
12 that you can recall learning about allegation related
13 to Mr. Epstein from your Googling from say 2006 to
14 2018?

15 A. Now, and -- I mean, it wasn't something --
16 I didn't Google a lot. I mean, I had a lot on my
17 plate.

18 Q. Sure.

19 A. And I did a lot of traveling with being
20 First Lady, but also, you know, taking my kids for
21 medical things and, you know, a lot of this job had
22 to do with me trying to spend a lot of time focusing
23 on my kids.

24 Q. Understood. Fair to say that you didn't
25 kind of do your own investigation to make sure you

1 were comfortable with Mr. Epstein?

2 MS. BOGGS: Objection, vague. You could
3 answer.

4 THE WITNESS: Well, I looked him in the
5 eye and asked him, you know "What the hell is
6 going on," that I had a family, that I had a
7 daughter and, you know, what's going on, and
8 what he said was just a mistake. Mistook
9 somebody to be older than they were.

10 And, you know -- and he got caught and had
11 to go to jail and register as a sex offender.
12 And I think I told you that I went home to my
13 17-year-old son and explained to him that this
14 is real life.

15 And I guess at that point, I just thought
16 that if I could look someone in the eye, I like
17 to tell the truth, and I figured that he was
18 going to tell me the truth.

19 Q. (By Mr. Neiman:) You found him convincing
20 when he responded to you?

21 A. Yes.

22 Q. All right. How did you learn that
23 Mr. Epstein's second arrest?

24 A. I was with my family, and my son was
25 going -- my youngest son was going to school at

1 know, like ten people and scour the island to make
2 sure that, you know, things were on the up and up.

3 I'm sorry, what was the question?

4 Q. My question was whether anybody from the
5 Virgin Islands law enforcement ever contacted you
6 about Mr. Epstein up to the time that he was arrested
7 for the second time in New York?

8 A. Up until?

9 Q. Up until that time.

10 A. No.

11 Q. Okay. Looking back, you know, obviously
12 hindsight is much clearer sometimes than what we
13 experience in realtime.

14 Is there anything that you saw that
15 looks different today than it did to you at the
16 time?

17 A. What I didn't see, and I guess what I
18 would have looked for were underage girls.

19 Q. Eh-hmm.

20 A. And I didn't -- I didn't see that. Maybe
21 that was -- and in hindsight now, you know, I didn't
22 have -- I didn't have an understanding about sex
23 trafficking.

24 You know, that somebody could be 30
25 years old and be sex trafficked. I didn't -- and

1 maybe -- maybe I've led a sheltered life, but I
2 didn't understand that.

3 And that, you know, if somebody is
4 introduced as somebody's girlfriend, I took it as
5 face value that that's their girlfriend.

6 So, in hindsight, you know, maybe some
7 alarm bells would have gone off with what I know
8 today, yes.

9 Q. Did any of the women that you met
10 associated with Mr. Epstein ever look distressed to
11 you at the time?

12 A. No. And I guess that's the reason why,
13 you know, the few times that they would come into the
14 office, they would ask, you know, ask somebody where
15 can we go to buy ice cream, or where -- you know,
16 they would go off on their own.

17 Q. Eh-hmm.

18 A. And I guess my naive idea about being
19 controlled and being, you know, is that, somebody's
20 got you, sort of tethered, and they, from my
21 understanding would fly down on their own, they'd fly
22 back on their own.

23 They would -- so, I just thought that
24 they were, you know girlfriends. And that they were
25 -- that they were doing all of this under their free

1 will.

2 Hindsight is 20/20, and sure, if I knew
3 then what I knew now, you know, but there is never a
4 time where I saw somebody under distress and would go
5 to him and say, "Are you okay, can I take you
6 somewhere?"

7 I mean, my security was my security for
8 eight years as female, and she was head of sexual
9 assault. And she would have been the first person
10 that I would have taken them to.

11 But it was not something that, you know,
12 that ever rang any bells, and I guess in my thoughts
13 he was deemed a sexual offender, and so he needs to
14 be monitored, you know, everything that he did. And
15 I had a lecture by -- we all did by Darren about,
16 hey, Jeffrey can't have -- he said this, you know,
17 Mr. Epstein can't have any new emails. All his cars
18 have to be registered. He can't have any new
19 addresses. So don't anybody go set up any -- any new
20 -- anything online for him. Don't, you know --
21 everything, everything about his life is monitored,
22 and that's what we were told, that every single thing
23 is monitored. Who he brings in, who he takes out,
24 everything is monitored.

25 And that he would keep track of his days

1 coming in and coming out, he and Erika, that we were
2 not to worry about that. But that we needed to make
3 sure that, you know, if asked, not to set up a new,
4 you know, Jeffrey St. Thomas email address him
5 because he could get in trouble. And so we
6 understood that.

7 Q. Okay. I notice you have your own counsel
8 here at the deposition today. Who is paying counsel's
9 bills?

10 A. I am.

11 Q. What did you do to prepare for today's
12 meeting?

13 A. I met with counsel on Saturday for about
14 six hours.

15 Q. And what did you do in that meeting?

16 A. I'm sorry.

17 Q. What did you do at that meeting?

18 MR. TEAGUE: I would object to anything
19 about conversations with counsel that fall
20 under attorney/client privilege. If you want
21 to ask how long she met with counsel and what
22 documents she may or may not have reviewed,
23 you may do so.

24 MR. NEIMAN: Sure.

25 Q. (By Mr. Neiman:) You said the meeting was